

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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DR. JUDY WOOD on behalf of the
UNITED STATES OF AMERICA,

Plaintiff / Realtor,

vs.

APPLIED RESEARCH ASSOCIATES, INC.;
SCIENCE APPLICATIONS INTERNATIONAL
CORP.; BOEING; NuSTATS; COMPUTER
AIDED ENGINEERING ASSOCIATES, INC.;
DATASOURCE, INC.; GEOSTAATS, INC.;
GILSANZ MURRAY STEFICEK LLP;
HUGHES ASSOCIATES, INC.; AJMAL
ABBASI, EDUARDO KAUSEL;
DAVID PARKS; DAVID SHARP; DANIELE
VENEZANO; JOSEF VAN DYCK, KASPAR
WILLIAM; ROLF JENSEN & ASSOCIATES,
INC.; ROSENWASSER/GROSSMAN CONSULTING
ENGINEERS, P.C.; SIMPSON GUMPERTZ &
HEGER, INC.; S.K. GHOSH ASSOCIATES,
INC.; SKIDMORE, OWINGS & MERRILL,
LLP; TENG & ASSOCIATES, INC.;
UNDERWRITERS LABORATORIES, INC.;
WISS, JANNEY, ELSTNER ASSOCIATES,
INC.; AMERICAN AIRLINES; SILVERSTEIN
PROPERTIES; and UNITED AIRLINES,

Defendants.
----- X

Civil Action
No. 07 CV 3314 (GBD)

ECF CASE

**NOTICE OF MOTION FOR
RULE 11 SANCTIONS**

PLEASE TAKE NOTICE that on a date and time to be determined by the Court,
Defendant Skidmore, Owings & Merrill LLP ("SOM") will move before the Honorable George
B. Daniels, United States District Judge at the United States Courthouse, Southern District of
New York, 500 Pearl Street, New York, New York, for an order granting sanctions, pursuant to
Rule 11 of the Federal Rules of Civil Procedure, against Plaintiff/Relator Judy Wood and

Plaintiff/Relator's counsel, Jerry V. Leaphart and the Law Offices of Jerry V. Leaphart & Associates, P.C.

This motion is supported by the accompanying Declaration of Chad E. Sjoquist, dated February 15, 2008, the Declaration of Chad E. Sjoquist in support of SOM's motion to dismiss, dated January 28, 2008, SOM's Memorandum of Law in support of its motion to dismiss, dated January 28, 2008, and the Memorandum of Law of Applied Research Associates, Inc. ("ARA") in support of ARA's motion for Rule 11 sanctions, dated January 23, 2008.

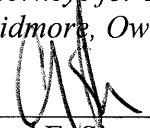
As explained in further detail in the accompanying Sjoquist Declaration, ARA's Memorandum of Law, and SOM's motion to dismiss, Plaintiff/Relator's Complaint is frivolous because it is clearly barred by the original source requirement of the False Claims Act. In addition, Plaintiff/Relator and her counsel have made no effort to comply with the heightened pleading requirements for allegations of fraud as codified in Fed. R. Civ. P. 9(b).

Because Plaintiff/Relator and her counsel have refused to withdraw these frivolous claims, SOM is entitled to sanctions pursuant to Fed. R. Civ. P. 11.

Dated: New York, New York
February 15, 2008

Respectfully submitted,

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CERTIFICATION OF SERVICE

I hereby certify that on March 19, 2008, I electronically filed the foregoing Notice and Declaration with the Clerk of the Court using the CM / ECF system, which will send notification of filing to the following recipients.

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